

**ANDREW JOHN CALCAGNO** (AC 3085)

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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

\_\_\_\_\_  
RICHARD ABONDOLO, as Chairman of the Board of :  
Trustees of UFCW LOCAL 174 COMMERCIAL :  
HEALTH CARE FUND, and RICHARD ABONDOLO, as :  
Chairman of the Board of Trustees of UFCW LOCAL 174 :  
PENSION FUND, :

Petitioners, :

-against- :

H. & M. S. MEAT CORP. a/k/a H & M S MEAT CORP., :  
Respondent. :

X

Case No. 07-cv-3870 (RJS)(RLE)  
ECF CASE

**NOTICE OF MOTION  
FOR SUMMARY  
JUDGMENT**

X

To: H & MS Meat Corp.  
Mr. Alan Lasky  
Hunts Point Coop Mkt, B-22  
Bronx, NY 10474

SIR:

PLEASE TAKE NOTICE that on a date and at a time designated by the Court, the undersigned, attorneys for Petitioners, Richard Abondolo, as Chairman of the Board of Trustees of UFCW Local 174 Commercial Health Care Fund and Richard Abondolo, as Chairman of the Board of Trustees of UFCW Local 174 Pension Fund, will move before the Honorable Richard J. Sullivan, U.S. District Court, Southern District of New York for an Order granting Petitioners summary judgment against Respondent in the amount of **\$8,940.29**; and

PLEASE TAKE FURTHER NOTICE that in support of the within motion, Petitioners, UFCW Local 174 Commercial Health Care Fund and UFCW Local 174 Pension Fund, shall rely upon the Brief and Affirmation submitted herewith; and

PLEASE TAKE FURTHER NOTICE that at that time and place aforesaid, Petitioners will request that the proposed for of Order submitted herewith be entered by the Court.

**CALCAGNO & ASSOCIATES**  
**Attorneys at Law, LLC**  
Attorneys for Petitioners,

By: s/ Andrew John Calcagno  
ANDREW JOHN CALCAGNO

December 10, 2007